



Mr. David Ponganis
Director of Programs
Northwestern Division
US Army Corps of Engineers

Subject: MRRIC Recommendations for Proposed Actions to Move Forward Fulfillment of the
ISAP Final Report on Spring Pulses and Adaptive Management

Dear Mr. Ponganis:

I am writing you on behalf of the Missouri River Recovery Implementation Committee (MRRIC or the Committee). The MRRIC has nearly 70 members comprised of States, Tribes, Federal Agencies, and Stakeholders associated with Missouri River. It was authorized by Congress in Section 5018 of the Water Resources Development Act of 2007 and established in 2008 by the Assistant Secretary of the Army for Civil Works (Secretary).

MRRIC recommends the USACE, in concert with the USFWS, proceed with a series of seven proposed actions (see below) for moving forward on fulfillment of the ISAP Final Report recommendations. These proposed actions are consistent with the ISAP recommendations; however they include some additional clarifications, based on MRRIC exchanges with the ISAP, which the Committee believes will be beneficial.

The Committee is providing these proposed actions based on: 1) review of the ISAP report;¹ 2) the clarifications from the ISAP in response to questions raised;² and 3) building on MRRIC's understanding of the conceptual process for moving forward as laid out by the agencies to the SAM Work Group in mid-April.³

As you consider the Committee's recommendations, please consider the following quote from the ISAP's Final Report, which provides useful context for MRRIC's role as efforts to move forward with the ISAP's recommendations are undertaken.

"The ISAP views our role as providing interpretations of available science and preparing scientific findings to inform the decision-making process of the MRRIC. Further, we identify

¹ ISAP Final Report on Spring Pulses and Adaptive Management, November 30, 2011

² See clarification communications from the ISAP (December 12, 2011; summary of January 26, 2012 SPA Task Group call with ISAP and follow-on clarification; April 9, 2012)

³ This conceptual framework will be shared with the full MRRIC in preparation for the May meeting and presented prior to MRRIC reaching closure on this recommendation.

gaps in information that, if filled, could enhance the knowledge upon which river management decisions can be made. We expect MRRIC to use the ISAP findings and interpretations to assess what actions are actually feasible, possible, and/or practicable given other constraints, including social constraints and existing Authorized Purposes, on the system.”

The Committee further supports the ISAP’s further definition of the term “social constraints” as intended to refer to non-scientific factors including social, cultural, economic, legal, or other considerations.⁴

Proposed Actions

1. An effects analysis should be developed that incorporates new knowledge that has accrued since the 2003 Amended Biological Opinion. As part of this analysis:
 - The effects of the Missouri and Kansas River Operations on the listed species should be reviewed and analyzed in the context of other stressors on the listed species;
 - The quantitative effects of potential management actions on the listed species should be documented to the extent possible; and
 - These potential management actions should be incorporated into the CEMs.
2. Conceptual ecological models should be developed for each of the three listed species and these models should articulate the effects of stressors and mitigative actions (including but not limited to flow management, habitat restoration actions, and artificial propagation) on species performance.
3. Other managed flow programs and adaptive management plans should be evaluated as guidance in development of the CEMs and AM strategy for the Missouri River Recovery Program.
4. An overarching adaptive management strategy should be developed that anticipates implementation of combined flow management actions and mechanical habitat construction, and this strategy should be used to guide future management actions, monitoring, research, and assessment activities within the context of regulatory and legal constraints.
5. Monitoring programs along the Missouri River should be designed so as to determine if hypothesized outcomes are occurring and the extent to which they are attributable to specific management actions.
6. The agencies should identify decision criteria (trigger points) that will lead to continuing a management action or selecting a different management action. A formal⁵ process should be designed and implemented to regularly compare incoming monitoring results with the decision criteria.

⁴ See April 9, 2012 ISAP Response to 3/22/12 SPA TG Clarification Questions

⁵ See April 9, 2012 ISAP Response to 3/22/12 SPA TG Clarification Questions

7. Aspects of how the entire hydrograph influences the three listed species should be evaluated when assessing the range of potential management actions.

We look forward to working with you on efforts to implement the proposed actions as defined in the SAM Work Group charge. The Committee thanks you for the opportunity to provide input on the efforts to implement the recommendations included in the ISAP's Final Report and hopes you thoughtfully consider our recommendations.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael Mac". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Mac".

Dr. Michael Mac

Chair

Missouri River Recovery Implementation Committee

Cc: Steve Guertin, Regional Director, Mountain Prairie Region, US Fish and Wildlife Service